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8 Attorneys for Defendants  
BLOCK, INC. and CASH APP INVESTING, LLC

9  
10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA

12 MICHELLE SALINAS and RAYMEL  
13 WASHINGTON, individually and on behalf of  
all others similarly situated,

14 Plaintiffs,

15 v.

16 BLOCK, INC. and CASH  
17 APP INVESTING, LLC,

18 Defendants.  
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Case No. 3:22-cv-04823-JSC

**STIPULATION PURSUANT TO CIVIL  
L.R. 6-1(B) AND [PROPOSED] ORDER  
TO MODIFY CASE SCHEDULE**

Judge: Hon. Jacqueline Scott Corley

1 Pursuant to Local Rule 6-1(b), Plaintiffs Michelle Salinas and Raymel Washington and  
2 Defendants Block, Inc. and Cash App Investing, LLC, by and through the undersigned counsel,  
3 hereby stipulate and agree to the following proposed modification of the case schedule:

4 WHEREAS, the Complaint (ECF No. 1) was filed in this action on August 23, 2022;

5 WHEREAS, the parties have previously stipulated, and the Court has approved, that the  
6 time for Defendants to answer or otherwise respond to the Complaint be extended to December 6,  
7 2022 (ECF Nos. 22, 25, 33, 34);

8 WHEREAS, a complaint was filed in an action captioned *Gordon v. Block Inc. and Cash*  
9 *App Investing, LLC*, No. 22-cv-6787 (N.D. Cal.) on November 2, 2022;

10 WHEREAS, on November 28, 2022, Defendants filed an Administrative Motion To  
11 Consider Whether Cases Should Be Related Pursuant to Civil L.R. 3-12 and 7-11, on the grounds  
12 that the *Gordon* complaint includes many of the same causes of action arising out of the same  
13 underlying facts as this action, and therefore involves the same persons and event such that there  
14 would be judicial inefficiency and a risk of inconsistent decisions should the cases be tried by  
15 different judges; and

16 WHEREAS, if the cases are related and the Court does not *sua sponte* consolidate them,  
17 Defendants intend to seek consolidation;

18 Plaintiffs and Defendants hereby stipulate that:

- 19 • The deadline for Defendants to answer or otherwise respond to the Complaint be  
20 extended to February 3, 2023.

21 This is the third extension sought by the parties to this litigation and is sought because the  
22 parties believe that it is appropriate for the Court to resolve the question of relation and  
23 consolidation of this action and the *Gordon* action before a responsive pleading is required.

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25 **IT IS SO STIPULATED.**  
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3 Dated: December 2, 2022

4 By: /s/ Aravind Swaminathan  
5 Aravind Swaminathan  
6 ORRICK, HERRINGTON & SUTCLIFFE LLP  
7 Attorneys for Defendants  
8 Block Inc. and Cash App Investing LLC

9 By: /s/ Gary Graifman  
10 Gary Graifman  
11 KANTROWITZ GOLDHAMER & GRAIFMAN, P.C.  
12 Attorneys for Plaintiffs

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14 **IT IS SO ORDERED.**

15 By: \_\_\_\_\_  
16 Hon. Jacqueline Scott Corley  
17 U.S. DISTRICT JUDGE  
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**Attestation re Electronic Signatures**

I, Aravind Swaminathan, attest pursuant to Northern District Local Rule 5-1(i)(3) that all other signatories to this document, on whose behalf this filing is submitted, concur in the filing's contents and have authorized this filing. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: December 2, 2022

By:                     /s/                      
                    ARAVIND SWAMINATHAN